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5 Attorneys for Plaintiff
6 TIM GALLI
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10 UNITED STATES DISTRICT COURT
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13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
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16 TIM GALLI,
17 Plaintiff,
18 vs.
19 PITTSBURG UNIFIED SCHOOL DISTRICT,
20 BARBARA WILSON AND PERCY MCGEE,
21 Defendants.
22
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24 CASE NO: 3:09-cv-03775-JSW
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27 DECLARATION OF MARK L.
28 VENARDI IN SUPPORT OF
OPPOSITON TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT

Date: May 20, 2011
Time: 9:00 a.m.

29 I, Mark L. Venardi, declare:
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32 1. I am an attorney licensed to practice law in the State of California, and am a
33 partner of the VENARDI LAW FIRM, attorneys of record for Plaintiff in this now pending action.
34 The matters stated in this declaration are true to my own personal knowledge, and if called upon
35 to testify, I could and would testify competently thereto.

36 2. Attached hereto as Exhibit A is a true and correct copy of the Deposition of
37 Barbara Wilson (April 22, 2010) at 18:6-9, 14-22; 23:3-4; 23:20-22; 24:1; 25:21-22; 26:1-15, 20-
38 22; 27:1-2; 41:22; 42:1-23; 43:11-24; 44:3-6; 46:2-7, 11-17; 55:19-20; 56:3-4, 9-16; 93:3-8;
39 101:4-22; 102:1-7.

40 3. Attached hereto as Exhibit B is a true and correct copy of the Deposition of Tim

1 5. Attached hereto as Exhibit D is a true and correct copy of the Deposition of Mark
2 Bonnett Deposition (December 8, 2010) at 21:1-2, 11-14; 23:2-4, 23:21-22; 29:1-4; 32:14-21;
3 33:6-9; 35:3-5; 36:13-16; 38:17-21; 42:11-15; 41:11-12; 57:7-14, 19-21; 67:17-19; 68:3-13, 18-
4 22; 69:21-25; 70:1-3; 71:10-22; 72:18-25; 73:1, 13-22; 74:16-19; 75:16-23; 85:18-24; 86:2-9;
5 96:2-4; 97:7-11.

6 6. Attached hereto as Exhibit E is a true and correct copy of Defendants' Responses
7 to Plaintiff's Request to Admit

8 7. Attached hereto as Exhibit F is a true and correct copy of the "California
9 Education Code" research memorandum drafted by Tim Galli.

10 8. Attached hereto as Exhibit G is a true and correct copy of PUSD's March 3
11 correspondence to Tim Galli.

12 9. Attached hereto as Exhibit H is a true and correct copy of Plaintiff's Responses to
13 Defendant's First Set of Requests for Admission.

14 10. Attached hereto as Exhibit I is a true and correct copy of the Deposition of
15 Vincent Ferrante (March 22, 2011.) at 22:17-24; 24:6-17.

16 11. Attached hereto as Exhibit J is a true and correct copy of PUSD's May 14, 2009
17 correspondence to Tim Galli.

18 12. Attached hereto as Exhibit K is a true and correct copy of Accusation and
19 Statement of Charges.

20 13. Attached hereto as Exhibit L is a true and correct copy of Supplemental
21 Accusation and Statement of Charges.

22 14. Attached hereto as Exhibit M is a true and correct copy of Tim Galli to Mark
23 Bonnett e-mail, dated January 6, 2009.

24 I declare under penalty of perjury under the laws of the State of California that the
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1 foregoing is true and correct, this 29th day of April, 2011.

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